REMARKS

Claims 1-7, 21 and 25-37 are all the claims presently pending in the application. Claims 1-3, 21 and 25 have been amended to more particularly define the invention. Claims 8-20 and 22-24 have been canceled. Claims 26-37 have been added to claim additional features of the claimed invention and to provide varied protection for the claimed invention.

It is noted that the claim amendments are made only for more particularly pointing out the invention, and not for distinguishing the invention over the prior art, narrowing the claims or for any statutory requirements of patentability. Further, Applicants specifically state that no amendment to any claim herein should be construed as a disclaimer of any interest in or right to an equivalent of any element or feature of the amended claim.

Claims 1-7, 21 and 25 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Porter (U.S. Patent No. 6,473,892). Claims 1-7, 21 and 25 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Leymaster et al. (U.S. Patent No. 6,182,095).

These rejections are respectfully traversed in the following discussion.

I.   THE CLAIMED INVENTION

The claimed invention (e.g., as defined by exemplary claim 1) is directed to a method of linking domain knowledge to document knowledge. The method includes rendering document knowledge as textual components with variable fields, building an object-oriented domain model including domain knowledge and <u>linking the document knowledge to the domain knowledge by linking the domain knowledge to document knowledge variables</u>.

Conventional document assembly systems represent documents as collections of paragraphs of text. Domain knowledge is captured as answers to a collection of user input questions. These answers are used to select and assemble a series of document

components. The series of questions and their answers are not organized as an object model, and hence has no structure.

Object modeling is a technique for modeling software systems. In an object model a domain is broken down into discrete entities called objects. Objects, in turn, possess attributes that represent properties of the object. The object model is used to describe the domain elements that a document's text directly or indirectly refers to, the object model may be captured and linked to the document. The lack of an explicit mechanism for linking a document variable to an expression that facilitated reference to any element in the object model discourages the use of powerful object modeling techniques for independently representing the domain content of a document.

The claimed invention of exemplary claim 1, on the other hand, provides a method of linking domain knowledge to document knowledge that includes rendering document knowledge as textual components with variable fields, building an object-oriented domain model including domain knowledge and <u>linking the document knowledge to the domain knowledge by linking the domain knowledge to document knowledge variables</u> (e.g., see Application at page 4, line 17 through page 5, line 2). This provides a dynamic document-to-domain linkage that allows different domain knowledge elements to be dynamically manipulated during the interactive configuration of a document (see Application at page 5, lines 13-15). This allows the user to edit text as the user would in a regular word processor while maintaining constant and dynamic access to information provided by the document system (see Application at page 6, lines 11-13).

II.   THE PRIOR ART REFERENCES

A.   The Porter Reference

The Examiner alleges that Porter teaches the claimed invention of claims 1-7, 21 and 25. Applicants submit, however, that there are elements of the claimed invention which are neither taught nor suggested by Porter.

Contrary to the Examiner's allegations, however, Porter does not teach or suggest *"linking said domain knowledge to document knowledge variables"* as recited in independent claim 1, and as similarly recited in independent claims 21 and 25.

As noted above, unlike conventional document assembly systems, the claimed invention of exemplary claim 1 provides a method of linking domain knowledge to document knowledge that includes rendering document knowledge as textual components with variable fields, building an object-oriented domain model including domain knowledge and <u>linking the document knowledge to the domain knowledge by linking the domain knowledge elements to document knowledge variables</u> (e.g., see Application at page 4, line 17 through page 5, line 2). This provides a dynamic document-to-domain linkage that allows different domain knowledge elements to be dynamically manipulated during the interactive configuration of a document (see Application at page 5, lines 13-15). This allows the user to edit text as the user would in a regular word processor while maintaining constant and dynamic access to information provided by the document system (see Application at page 6, lines 11-13).

Clearly the novel features of the claimed invention are not taught or suggested by Porter. Indeed, the Examiner attempts to rely on Figures 1-10 and column 1, line 1 through column 20, line 34 of Porter to support his allegations. The Examiner, however, is clearly incorrect.

Porter merely discloses a document assembly system that creates a document by selecting specific paragraphs of text and inserting them into a document based on a user's input (Porter at column 6, lines 51-60). The inputted data is structured in an input data object, which is consulted by an interpreter when the interpreter prepares documents and adjusts the content of the documents accordingly (Porter at column 7, lines 11-20). A plurality of form generators include source code indicating the circumstances under which the interpreter is to generate the associated document. A compiler generates a separate form object for each form generator. Each form object, when executed by the interpreter, generates a separate document (Porter at column 7, lines 28-60).

Nowhere, however, does Porter teach or suggest <u>linking the document knowledge to the domain knowledge by linking the domain knowledge to the document knowledge variables</u>. Indeed, Porter does not even mention, let alone teach or suggest, <u>linking the document knowledge to the domain knowledge by linking the domain knowledge to the document knowledge variables</u>.

Furthermore, if the Examiner wishes to pursue this rejection, Applicants respectfully request that the Examiner specifically point to each element in the specification that teaches or suggests the recited limitations of the claimed invention, as opposed to broadly referring to the entire specification or the entire description of the preferred embodiments section of Porter.

Therefore, Applicants submit that there are elements of the claimed invention that are not taught or suggest by Porter. Therefore, the Examiner is respectfully requested to withdraw this rejection.

B.   The Leymaster Reference

The Examiner alleges that Leymaster teaches the claimed invention of claims 1-7, 21 and 25. Applicants submit, however, that there are elements of the claimed invention which are neither taught nor suggested by Leymaster.

Contrary to the Examiner's allegations, however, Leymaster does not teach or suggest "*linking said domain knowledge to document knowledge variables*" as recited in independent claim 1, and as similarly recited in independent claims 21 and 25.

As noted above, unlike conventional document assembly systems, the claimed invention of exemplary claim 1 provides a method of linking domain knowledge to document knowledge that includes rendering document knowledge as textual components with variable fields, building an object-oriented domain model including domain knowledge elements and <u>linking the document knowledge to the domain knowledge by linking the domain knowledge to document knowledge variables</u> (e.g., see Application at page 4, line 17 through page 5, line 2). This provides a dynamic document-to-domain linkage that allows different domain knowledge elements to be dynamically manipulated during the interactive configuration of a document (see Application at page 5, lines 13-15). This allows the user to edit text as the user would in a regular word processor while maintaining constant and dynamic access to information provided by the document system (see Application at page 6, lines 11-13).

Clearly the novel features of the claimed invention are not taught or suggested by Leymaster. Indeed, the Examiner attempts to rely on Figures 1-29 and column 1, line 1

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through column 16, line 59 of Leymaster to support his allegations. The Examiner, however, is clearly incorrect.

Leymaster merely discloses a document generator in which specific text segments forming an output document are chosen based on a user's input answers to a series of questions. The specific text segments are assembled in accordance with a stored knowledge base (Leymaster at column 4, lines 55-65). The user is presented with structure questions and structure response data is received from the user's responses. The user provides response data indicating whether a described characteristic is pertinent to the deal or transaction being contemplated. Each structure element is associated with a document text segment (Leymaster at column 5, lines 11-54).

Nowhere, however, does Leymaster teach or suggest <u>linking the document knowledge to the domain knowledge by linking the domain knowledge to the document knowledge variables</u>. Indeed, Leymaster does not even mention, let alone teach or suggest, suggest <u>linking the document knowledge to the domain knowledge by linking the domain knowledge to the document knowledge variables</u>.

Furthermore, if the Examiner wishes to pursue this rejection, Applicants respectfully request that the Examiner specifically point to each element in the specification that teaches or suggests the recited limitations of the claimed invention, as opposed to broadly referring to the entire specification or the entire description of the preferred embodiments section of Leymaster.

Therefore, Applicants submit that there are elements of the claimed invention that are not taught or suggest by Leymaster. Therefore, the Examiner is respectfully requested to withdraw this rejection.

III.   NEW CLAIMS

New claims 26-37 are added to provide more varied protection for the present invention and to claim additional features of the invention. These claims are independently patentable because of the novel features recited therein.

Applicant respectfully submits that new claim 26-37 are patentable over any combination of the applied references at least for analogous reasons to those set forth above with respect to claims 1-7, 21 and 25.

IV. FORMAL MATTERS AND CONCLUSION

In response to Examiner's objections, the specification and claims have been amended in a manner believed fully responsive to all points raised by the Examiner.

In response to the Examiner's objection to the specification based on Applicants' use of the terms "document knowledge" and "domain knowledge" Applicants respectfully submit that there is a difference between "document knowledge" and "domain knowledge", and "document component" and "domain component", respectively. Document assembly systems present documents as a collection of paragraphs of text as document components (see Application at page 2, lines 2-3). Document components refer to elements of a domain model (see Application at page 2, line 11). Domain knowledge is captured as answers to a collection of questions. These answers are used to select and assemble a series of document components (see Application at page 2, lines 14-16).

An object model is a formal, symbolic representation of the objects in a domain, and the relationship between those objects. Reusable subsets of an object model representing a domain are called domain components (see Application at page 3, lines 1-5). Those skilled in the art would know and understand the difference between the terms "document knowledge" and "domain knowledge", and "document component" and "domain component".

In view of the foregoing, Applicants submit that claims 1-7, 21, and 25-37, all of the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a <u>telephonic or personal interview</u>.

Serial No. 09/497,801
Docket No. YOR999-201
YOR.093

The Commissioner is hereby authorized to charge any deficiency in fees or to
credit any overpayment in fees to Assignee's Deposit Account No. 50-0510.

Respectfully Submitted,

Date: June 14, 2004

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